

# Exhibit 20



# WA Money Transmitter Amendment Checklist (Company)

## CHECKLIST SECTIONS

- [General Information](#)
- [Amendments](#)

## GENERAL INFORMATION

### Instructions

When making changes to your record in NMLS, Washington DFI requires advance notification for some changes. See the checklist below for details.

### Uploading Agency-Specific Documents

If you are required to upload documents to NMLS for an Advance Change Notice (ACN), select "Advance Change Notice" for the document type in the NMLS Document Uploads section. If you are required to upload documents for an amendment that doesn't require ACN, select the applicable document type in the NMLS Document Uploads section.

**Note:** Use the recommended filing naming convention found on the [Document Upload Descriptions and Examples](#).

### Helpful Resources

- [Amendments & Advance Change Notice](#)
- [Document Uploads Quick Guide](#)
- [Document Upload Descriptions and Examples](#)

### Agency Contact Information

Contact Washington DFI licensing staff by phone at 360-902-8703 or send your questions via email to [CSLicensing@dfi.wa.gov](mailto:CSLicensing@dfi.wa.gov) for additional assistance.

**\*\*\*\*\*DO NOT MAIL ANY DOCUMENTATION TO WASHINGTON DFI**

THE APPLICANT/LICENSEE IS FULLY RESPONSIBLE FOR ALL OF THE REQUIREMENTS OF THE LICENSE FOR WHICH THEY ARE APPLYING. THE AGENCY SPECIFIC REQUIREMENTS CONTAINED HEREIN ARE FOR GUIDANCE ONLY TO FACILITATE APPLICATION THROUGH NMLS. SHOULD YOU HAVE QUESTIONS, PLEASE CONSULT LEGAL COUNSEL.

## AMENDMENTS

**Notification (ACN) through NMLS 30 days prior.** See WAC 208-690-115.

- A change of 50% or more of Direct Ownership
  - If no new application is required: \$30
  - If new application is required: \$1,000. Refer to New Application Checklist for requirements

**Notification through NMLS within 30 days of the occurrence.** See WAC 208-690-110

- Notifications that require \$30 fee:
  - [Change of Legal Name](#)
  - [Change of Main Address](#)
  - [Addition or Modification of Other Trade Name](#)
  - [Change of Legal Status](#)
  - [Addition or Modification of Direct Owners/Executive Officers](#)
    - NMLS may also require \$36.25 for a FBI Criminal Background Check and \$15.00 for a Credit Report authorization
  - [Addition or Modification of Qualifying Individuals](#)
- **Amendments with no fees**
  - [Addition or Modification of Indirect Owners](#)
  - [Change of Disclosure Question\(s\)](#)
  - [Addition or Modification of Affiliates/Subsidiaries](#)
  - Change of mailing or email address
  - Change of records location
  - Obtaining or revocation or surrender of a money services license in any other jurisdiction
  - The conviction of the licensee, an executive officer, responsible individual, board director, AML compliance officer, principal, or other person in control of a misdemeanor or gross misdemeanor involving a financial transaction
  - Change in your business bank account including its closure or a change in the location or identity of the bank holding the account
  - A change in the business plan from that submitted at time of application
  - Any other similar activities or events affecting the business or executive officers or other person in control
    - A fee may be required depending on the “other change” reported
  - Data breach. This requirement may change based on directives or recommendations from law enforcement. Also see WAC 208-690-270

**Note:** Information uploaded or filed in NMLS will not be viewable to the agency until the filing has been attested to and submitted through NMLS. Agency-specific requirements that should be emailed to the agency on the checklist below and must be received with the appropriate checklist within five (5) business days of the electronic submission of your filing through NMLS.

**Note:** Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.

Complete	WA Money Transmitter  <b>Change of Legal Name Amendment Items</b>	Submitted via...
<input type="checkbox"/>	<p>Submit an amendment for a change of Legal Name through the Company Form (MU1) in NMLS.</p> <p><b>Fee:</b> \$30.00 per license</p> <p><b>Note:</b> All changes need to be reported within 30 days of the occurrence.</p>	<b>NMLS</b> <b>NMLS (Filing submission) for the fee</b>
<input type="checkbox"/>	<p><b>Surety Bond:</b> Submit an Electronic Surety Bond Rider via NMLS showing the legal name change furnished &amp; submitted by a surety company authorized to conduct business in Washington. See the <a href="#">ESB Adoption Table</a> and the <a href="#">ESB for NMLS Licensees page</a> of the NMLS Resource Center for more information.</p>	<b>Submit electronically through NMLS</b>
Note	<p>You will also want to contact the following agencies to update your legal name change and DFI will verify this updated directly with each agency.</p> <ul style="list-style-type: none"> <li>Secretary of State <a href="http://www.secstate.wa.gov">www.secstate.wa.gov</a></li> <li>Business Licensing Services Agency <a href="http://www.bls.dor.wa.gov">www.bls.dor.wa.gov</a></li> <li>Department of Revenue (if applicable) <a href="http://www.dor.wa.gov">www.dor.wa.gov</a></li> </ul>	N/A
Complete	WA Money Transmitter  <b>Change of Physical, Mailing or Records Location Address Amendment Items</b>	Submitted via...
<input type="checkbox"/>	<p>Submit an amendment for a change to the Main (Corporate) Physical, Mailing, E-Mail, and Books and Records address through the Company Form (MU1) in NMLS.</p> <p><b>Fee:</b> \$30.00 for a change of Main (Corporate) Physical Address. No fees for other changes.</p> <p><b>Note:</b> All changes need to be reported within 30 days of the occurrence.</p>	<b>NMLS</b> <b>NMLS (Filing submission) for Main Physical Address fee</b>
Note	<p>You will also want to contact the following agencies to update your address change(s) and DFI will verify this updated directly with each agency.</p> <ul style="list-style-type: none"> <li>Secretary of State <a href="http://www.secstate.wa.gov">www.secstate.wa.gov</a></li> </ul>	N/A

<b>Complete</b>	<b>WA Money Transmitter</b>  <b>Change of Physical, Mailing or Records Location Address Amendment Items</b>	<b>Submitted via...</b>
	<ul style="list-style-type: none"> <li>Business Licensing Services Agency <a href="http://www.bls.dor.wa.gov">www.bls.dor.wa.gov</a></li> <li>Department of Revenue (if applicable) <a href="http://www.dor.wa.gov">www.dor.wa.gov</a></li> </ul>	

<b>Complete</b>	<b>WA Money Transmitter</b>  <b>Addition or Modification of Other Trade Name Amendment Items</b>	<b>Submitted via...</b>
<input type="checkbox"/>	<p>Submit an amendment for an addition of or change to an Other Trade Name through the Company Form (MU1) in NMLS.</p> <p><b>Fee:</b> \$30.00 per license</p> <p><b>Note:</b> All changes need to be reported within 30 days of the occurrence..</p>	<b>NMLS</b>  <b>NMLS (Filing submission) for the fee</b>
<b>Note</b>	Register the new trade name with the Washington Business Licensing Services Agency at <a href="http://www.dor.bls.wa.gov">www.dor.bls.wa.gov</a>	<b>N/A</b>

<b>Complete</b>	<b>WA Money Transmitter</b>  <b>Deletion of Other Trade Name Amendment Items</b>	<b>Submitted via...</b>
<input type="checkbox"/>	<p>Submit an amendment for deletion of an Other Trade Name through the Company Form (MU1) in NMLS.</p> <p><b>No fee is due.</b></p> <p><b>Note:</b> All changes need to be reported within 30 days of the occurrence.</p>	<b>NMLS</b>
<b>Note</b>	Contact the Washington Business Licensing Services Agency to remove the trade name from your company business license. ( <a href="http://www.dor.bls.wa.gov">www.dor.bls.wa.gov</a> )	<b>N/A</b>

<b>Complete</b>	<b>WA Money Transmitter</b>  <b>Change of Legal Status Amendment Items</b>	<b>Submitted via...</b>
<p><b>Note:</b> In many cases, a change to the Fiscal Year End, Legal Status, and State or Date of Formation indicates a new entity has been formed and a new NMLS record is required. This includes the creation of a new NMLS account and submission of a new Company Form (MU1).</p>		
<input type="checkbox"/>	<p><b>Change of Legal Status:</b> If the company's change in legal status entails a change in Tax Identification Number then STOP and contact Licensing at 360-902-8703 or email <a href="mailto:CSLicensing@dfi.wa.gov">CSLicensing@dfi.wa.gov</a> for your next steps.</p> <p>For change to Fiscal Year End, State or Date of Formation, that don't change the</p>	<b>NMLS</b>

<b>Complete</b>	<b>WA Money Transmitter</b>  <b>Change of Legal Status Amendment Items</b>	<b>Submitted via...</b>
	<p>Tax Identification Number, submit an amendment for a change in Legal Status within the Company Form (MU1) in NMLS.</p> <p><b>No fee is due.</b></p> <p><b>Note:</b> All changes need to be reported within 30 days of the occurrence.</p>	

<b>Complete</b>	<b>WA Money Transmitter</b>  <b>Addition or Modification of Direct Owners/Executive Officers Amendment Items</b>	<b>Submitted via...</b>
<input type="checkbox"/>	<p><b>If the change of Direct Ownership is 50% or more:</b> submit an <u>ACN</u> for an addition or change in Direct Owners/Executive Officers within the Company Form (MU1) in NMLS. 30 Days' notice must be provided for this change. See WAC-690-115(4). This change <b>may require a new application to be filed.</b></p> <p><b>If the Direct Ownership is less than 50% or if an Executive Officer is being added or removed:</b> submit an <u>amendment</u> for an addition or change in Direct Owners/Executive Officers within the Company Form (MU1) in NMLS. Changes must be reported within 30 days of the occurrence.</p> <p><b>Fee:</b> \$30.00 per person being added or \$1,000.00 if new application required.</p>	<p><b>NMLS</b></p> <p><b>NMLS (Agency Fee Invoice)</b></p>
<input type="checkbox"/>	<p><b>Credit Report:</b> Individuals in a position of <u>control</u> are required to authorize a credit report through NMLS. Individuals will be required to complete an Identity Verification Process (IDV) along with an individual attestation before a license request for your company can be filed through NMLS.</p>	<b>NMLS</b>
<input type="checkbox"/>	<p><b>Criminal Background Check:</b> Individuals in a position of <u>control</u> are required to authorize a Criminal Background Check through NMLS. Individuals will be required to complete an Identity Verification Process (IDV) along with an individual attestation before a license request for your company can be filed through NMLS.</p>	<b>NMLS</b>

<b>Complete</b>	<b>WA Money Transmitter</b>  <b>Addition or Modification of Indirect Owners Amendment Items</b>	<b>Submitted via...</b>
<input type="checkbox"/>	<p>Submit an amendment for an addition or change in Indirect Owners within the Company Form (MU1) in NMLS.</p> <p><b>Note:</b> All changes need to be reported within 30 days of the occurrence.</p>	<b>NMLS</b>

Complete	<b>WA Money Transmitter</b> <b>Addition or Modification of Qualifying Individual Amendment Items</b>	Submitted via...
<input type="checkbox"/>	Submit an amendment for an addition or change in Qualifying Individuals within the Company Form (MU1) in NMLS. <b>Fee:</b> \$30.00 per license <b>Note:</b> All changes need to be reported within 30 days of the occurrence.	<b>NMLS</b> <b>NMLS (Filing submission)</b>
<input type="checkbox"/>	<b>Credit Report:</b> Individuals in a position of <u>control</u> are required to authorize a credit report through NMLS. Individuals will be required to complete an Identity Verification Process (IDV) along with an individual attestation before a license request for your company can be filed through NMLS.	<b>NMLS</b>
<input type="checkbox"/>	<b>Criminal Background Check:</b> Individuals in a position of <u>control</u> are required to authorize a Criminal Background Check through NMLS. Individuals will be required to complete an Identity Verification Process (IDV) along with an individual attestation before a license request for your company can be filed through NMLS.	<b>NMLS</b>
Complete	<b>WA Money Transmitter</b> <b>Change of Disclosure Question(s) Amendment Items</b>	Submitted via...
<input type="checkbox"/>	Submit an amendment for a change to Disclosure Question response(s) through the Company Form (MU1) in NMLS.	<b>NMLS</b>
<input type="checkbox"/>	<b>Changing a Response from No to Yes:</b> Provide a complete and detailed explanation and document upload for each response that changes from "No" to "Yes" for company or each control person. See the <a href="#">Company Disclosure Explanations Quick Guide</a> for instructions.	<b>Upload in NMLS in the Disclosure Explanations section of the Company Form (MU1) or Individual Form (MU2).</b>
<input type="checkbox"/>	<b>Changing a Response from Yes to No:</b> When changing a Disclosure Question response from Yes to No, you will be required to remove the question from the associated Disclosure Explanation and provide an Amendment Reason. You must select "Add Explanation For "No" Responses" and provide an explanation for each response that changes from "Yes" to "No" for company or each control person. If applicable you must also upload a document (PDF) related to the explanation. See the <a href="#">Company Disclosure Explanations Quick Guide</a> for instructions.	<b>NMLS</b>